

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In Re:</b>	§	<b>Case No. 22-90053</b>
<b>Tulsa Inspection Resources, LLC, et al.</b>	§	<b>(Administered Jointly under</b>
<b>Debtor(s)</b>	§	<b>Case No. 22-90039)</b>
	§	<b>Chapter 11</b>

**MOTION OF DCP OPERATING COMPANY, LP, DCP SAND HILLS PIPELINE, LLC  
AND HOBLIT DARLING RALLS HERNANDEZ HUDLOW, LLP FOR RELIEF FROM  
THE AUTOMATIC STAY OF 11 U.S.C. §362  
\*\*With Variance Request\*\***

**THIS IS A MOTION FOR RELIEF FROM THE AUTOMATIC STAY. IF IT IS GRANTED, THE MOVANT MAY ACT OUTSIDE OF THE BANKRUPTCY PROCESS. IF YOU DO NOT WANT THE STAY LIFTED, IMMEDIATELY CONTACT THE MOVING PARTY TO SETTLE. IF YOU CANNOT SETTLE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY AT LEAST 7 DAYS BEFORE THE HEARING. IF YOU CANNOT SETTLE, YOU MUST ATTEND THE HEARING. EVIDENCE MAY BE OFFERED AT THE HEARING AND THE COURT MAY RULE.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

**THERE WILL BE A HEARING ON THIS MATTER ON TUESDAY, JULY 12, 2022, AT 9:00 A.M. IN COURTROOM 404, 515 RUSK, HOUSTON, TX 77002.**

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

Comes now, DCP OPERATING COMPANY, LP; DCP SAND HILLS PIPELINE, LLC and HOBLIT DARLING RALLS HERNANDEZ HUDLOW, LLP, hereinafter referred to as “Movant,” and files this its Motion for Relief from the Automatic Stay of 11 U.S.C. §362 as follows:

**I.  
Jurisdiction and Parties**

- 1.** Tulsa Inspection Resources, LLC, et al, hereinafter referred to as the “Debtor,” commenced the above captioned Chapter 11 case on May 8, 2022.
- 2.** This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. §§ 157, 11 U.S.C. § 362, and other applicable Code provisions.

**II.**  
**Request for Relief from the Automatic Stay**  
**11 U.S.C. § 362**

3. On or about May 19, 2021 Movant filed its Sixth Amended Petition in the District Court of Bexar County, 407th Judicial District, to recover damages for property damage sustained in an incident which occurred on November 10, 2018. *Exh. A.*

4. The case number is 2019-CI-03992 styled as *DCP Operating Company, LP and DCP Sand Hills Pipeline, LLC vs. Pumpco, Inc., EPIC Y-Grade Pipeline, LP, EPIC Y-Grade GP, LLC f/k/a EPIC Y-Grade Holdings GP, LLC, Mastec North America, Inc., Mastec, Inc., Atwell, LLC, TMI Solutions, LLC, Tulsa Inspection Resources, LLC, Landpoint, LLC, and C&S Lease Service, L.C.*; which has been consolidated with Cause No. 2018-CI-22638 styled as *Emmanuel Limon Ruiz and Christian Emmanuel Limon Soto vs. DCP Operating Company, LP and DCP Sand Hills Pipeline, LLC, EPIC Y-Grade Pipeline, LP, C&S Lease Service, L.C., Tulsa Inspection Resources, LLC, TMI Solutions, LLC, Guadalupe Valdez, Atwell, LLC; and Landpoint, LLC*; pending in the 407th Judicial District Court of Bexar County, Texas The State Court Case is currently pending and abated due to the instant bankruptcy filing.

5. There is no great prejudice to the Debtor in continuation of the litigation as Movant seeks to establish liability and claim amount as to Debtor while also pursuing non-debtor parties and applicable insurance, but not pursue collection against the property of the estate other than applicable filing of a claim in this case. There is significant hardship to Movant if Movant is denied proceeding forward as applicable insurance proceeds may hinge on first establishing liability of the Debtor. Further, Movant has a strong probability of prevailing on the merits of its claim.

6. Movant requests the stay be lifted in order to proceed with state court litigation to i) determine liability of the Debtor, ii) the amount of claim Movant has against Debtor, iii) proceed

against other parties and potentially available insurance proceeds which may only become triggered upon liability of the Debtor and determination of amount, and iv) and for the insurance carrier's obligation to provide defense, contribution, and/or indemnity.

7. Movant requests that the automatic stay of 11 U.S.C. § 362 be terminated "for cause" to allow Movant to exercise its rights.

8. Based upon and/or all of the foregoing, Movant requests that the automatic stay of 11 U.S.C. § 362 be terminated with regard to Movant.

9. Movant certifies that prior to filing this Motion an attempt was made to confer with Debtor's counsel by email June 20, 2022 at 11:09 a.m. by Noe J. Saucedo. At 2:35 p.m., Noe J. Saucedo received a call from Debtor's counsel Mike Jones and the parties are working on an agreement.

**WHEREFORE, PREMISES CONSIDERED,** Movant prays for the following relief:

1. That the automatic stay of 11 U.S.C. § 362 be terminated to allow Movant to proceed with litigation in the State Court case.
2. For all such other and further relief, general and special, legal and equitable, to which Movant may show itself justly entitled.

*[Signature on following page]*

Respectfully submitted,

**HOBLIT DARLING RALLS**

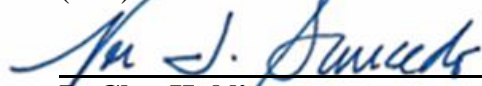
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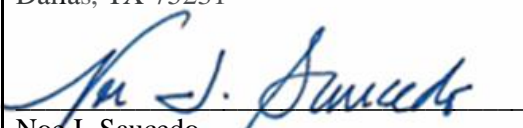
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\*service by e-mail to this address only

**ATTORNEYS FOR MOVANT**

**CERTIFICATE OF SERVICE AND CERTIFICATE OF COMPLIANCE WITH BLR 4001**

A copy of this motion was served on the persons shown below at the addresses reflected on that on **June 20, 2022**, by electronic mail or by prepaid United States first class mail. Movant certifies that Movant has complied with Bankruptcy Local Rule 4001.

<b><i>Debtor</i></b>	<b><i>Debtors' Attorney</i></b>
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